


ORIGINAL

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

JAN - 9 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KEVIN R. WEIMER, Clerk  
By:  Deputy Clerk

UNITED STATES OF AMERICA

*v.*

SIMEON DOTY

Criminal Indictment

No. **1 : 24 CR - 0014**

THE GRAND JURY CHARGES THAT:

**Counts One through Twelve**

(Making False Statement to Licensed Firearms Dealer – 18 U.S.C. § 922(a)(6))

On or about each date alleged in Column B below, in the Northern District of Georgia, the defendant, SIMEON DOTY, aided and abetted by others known and unknown to the Grand Jury, knowingly made a false and fictitious written statement to the licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, as identified in Column C below, in connection with the acquisition of at least one of the corresponding firearms listed in Column D below, which statement was intended and likely to deceive the firearms dealers as to a fact material to the lawfulness of the acquisition of said firearm(s) under Chapter 44, Title 18, United States Code, that is:

Column A Count	Column B	Column C	Column D
	Date	Licensed Firearms Dealer	Firearm(s) Acquired by Defendant
1	11/10/2020	Arrowhead Pawn Shop	Glock, model 21 Gen 4, .45caliber pistol; Glock, model 43, 9mm pistol
2	11/16/2020	Arrowhead Pawn Shop	Glock, model 19X, 9mm pistol; Glock, model 26 Gen 4, 9mm pistol
3	11/ 17/ 2020	Arrowhead Pawn Shop	Glock, model 43, 9mm pistol
4	11/18/ 2020	Arrowhead Pawn Shop	(2) Glock, model 48, 9mm pistols
5	11/30/2020	Arrowhead Pawn Shop	Glock, model 43, 9mm pistol; Glock, model 22 Gen 4, 9mm pistol
6	12/1/ 2020	Arrowhead Pawn Shop	Glock, model 43, 9mm pistol
7	12/7/ 2020	Arrowhead Pawn Shop	Glock, model 26 Gen 4, 9mm pistol; Glock, model 19 Gen 5, 9mm pistol
8	12/8/ 2020	Arrowhead Pawn Shop	Glock, model 19 Gen 5, 9mm pistol
9	12/9/ 2020	Arrowhead Pawn Shop	Glock, model 43, 9mm pistol
10	12/18/2020	Arrowhead Pawn Shop	Glock, model 10 Gen 5, 9mm pistol; Glock, model 26 Gen 4, 9mm pistol; Glock, model 43, 9mm pistol;

			Glock, model 27 Gen 5, .40 caliber pistol; Glock, model 23, .40 caliber pistol
11	12/24/2020	Arrowhead Pawn Shop	Smith & Wesson, model SD9, 9mm pistol; Smith & Wesson, model SD9VE, 9mm pistol; FMK, model 9Cl, 9mm pistol
12	12/28/2020	Arrowhead Pawn Shop	Smith & Wesson, model M&P Shield, 9mm pistol; Smith & Wesson, model M&P Shield, .45 caliber pistol; Smith & Wesson, model SD9VE, 9mm pistol; Taurus, model G2S, 9mm pistol; SCCY, model CPX-1, 9mm pistol; Springfield, model Hellcat, 9mm pistol; (2) Smith & Wesson, model M&P Shield, 9mm pistols

all in violation of Title 18, United States Code, Section 922(a)(6) and Section 2.

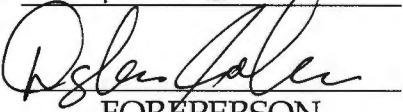
### **Forfeiture Provision**

Upon conviction of one or more of the offenses alleged in Counts One through Twelve of the Indictment, the defendant, SIMEON DOTY, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offenses.

If, any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A True BILL  
  
FOREPERSON

RYAN K. BUCHANAN  
United States Attorney  
*Dashene A. Cooper*  
DASHENE A. COOPER  
Assistant United States Attorney  
Georgia Bar No. 385738

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